

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler, District  
Court Judge

Honorable Karen M. Williams,  
Magistrate Judge

Honorable Thomas Vanaskie (Ret.),  
Special Discovery Master

**[PROPOSED] ORDER**

**THIS MATTER** having come before the Court upon the ZHP Parties' Objection to Special Master Order No. 28, and the Court having considered the parties' submissions; and for good cause shown:

It is, on this \_\_\_\_\_ day of \_\_\_\_\_  
2021, **ORDERED AND ADJUDGED** that the motion to vacate Special Master Order No. 23 is **GRANTED**;

IT IS FURTHER ORDERED that the ZHP Parties' motion for a protective order precluding the deposition of Mr. Chen is **GRANTED**.

\_\_\_\_\_  
Robert B. Kugler,  
United States District Judge